November 19, 2012

Administrator Lisa Jackson
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Mail Code: 1101A
Washington, DC 20460

Dear Administrator Jackson:

We are writing on behalf of the various undersigned organizations with regards to numeric nutrient pollution water quality standards for fresh and marine waters in the State of Florida. Our groups are collectively dedicated to restoring Florida’s exceptional water resources including America’s Everglades, an iconic unique ecosystem that has been severely degraded by nutrient pollution.

We would like to express our strong support for EPA’s proposed numeric nutrient criteria for Florida, as well as our opposition to the numeric nutrient standards currently proposed by the Florida Department of Environmental Protection (FDEP) and under review by the EPA. EPA’s standards would prevent severe water quality degradation from nutrient pollution, while the FDEP rule actually requires impairment before any real standards or pollution containment requirements are enacted. Vital aspects of effective nutrient water quality standards, such as downstream protection values and true effective flowing waters standards for all Class III flowing waters (including altered/artificial, intermittent, South Florida and tidal flowing waters) are lacking in the state proposal. Without these, the state proposal would not effectively control nutrient pollution at its source or prevent the biological and water quality failures that are continuing to become more evident and widespread throughout the greater Everglades ecosystem.

We understand that the state’s proposal is currently under review by EPA, and we urge that EPA to thoroughly assess this proposal of paramount importance to the public health, economy and environment of Florida and its citizens – as well as being of critical importance for restoring America’s Everglades and precedent setting for regulating nutrient pollution throughout the entire nation. We strongly believe that
EPA should not approve the current state proposal, but instead ensure that it is fundamentally rectified to include sufficiently protective actual in-stream numeric nutrient standards and downstream protective values for all Class III flowing waters in Florida, as well as create criteria that are similarly stringent to EPA’s proposal for all other types of waters.

Please feel free to contact any of us to discuss this further and thank you for your time and consideration in this matter.

Sincerely,

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